

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA
THIRD DIVISION**

MINNEAPOLIS FIREFIGHTERS' RELIEF
ASSOCIATION, et al.,

Court File No. 0:08-cv-6324-PAM-AJB

Plaintiffs,

v.

MEDTRONIC, INC., WILLIAM A.
HWAKINGS, II and GARY ELLIS,

Defendants.

STIPULATION

WHEREAS, this Court entered a Scheduling Order on January 27, 2011 (Dkt. 178), which was amended by the Court's Order on May 17, 2011 (Dkt. No. 189);

WHEREAS, the parties have been diligently pursuing discovery in an attempt to meet those deadlines, but believe additional time for the deadlines in the current order is necessary given ongoing meet and confer discussions and pending motions to compel;

NOW, THEREFORE, subject to the Court's approval and for good cause shown, the parties hereby agree and stipulate to the following schedule:

Class Certification Motion

1. Any reply in further support of Lead Plaintiffs' motion to certify the Class must be served and filed on or before October 14, 2011.

Discovery Plan

1. Fact discovery shall be commenced in time to be completed by April 9, 2012. All discovery motions shall be commenced in time to be resolved by the Court by April 9, 2012.
2. Expert discovery, including depositions, shall be completed by August 13, 2012.

Non-Dispositive Motions

1. All motions which seek to amend the pleadings or add parties must be served by February 9, 2012.
2. All other non-dispositive motions and supporting documents shall be served and filed by August 27, 2012.

Experts

1. Plaintiffs shall make the full disclosures required by Rule 26(a)(2)(B), accompanied by the written reports prepared and signed by each expert witness, on or before May 8, 2012. Rebuttal reports are due on or before July 6, 2012.
2. Defendants shall make the full disclosures required by Rule 26(a)(2)(B), accompanied by the written reports prepared and signed by each expert witness, on or before May 8, 2012. Rebuttal reports are due on or before July 6, 2012.

Dispositive Motions

All dispositive motions shall be served, filed, and HEARD by the Court by November 29, 2012. Thus, all dispositive motions must be filed and served by September 11, 2012. Responsive briefs are due October 9, 2012. Reply briefs are due November 6, 2012.

Trial

This case shall be ready for a trial on February 28, 2013, or upon resolution of any pending dispositive motions.

Dated: July 29, 2011

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